

Staff Report

for

Item 14

Discussion

August 14, 2002

U.S. Navy, Naval Base Point Loma tentative Order No. R9-2002-0002 NPDES Permit No. CA0109363

The U.S. Navy installations in the San Diego area fall under the *U.S. Navy, Commander, Navy Region Southwest* (CNRSW) command structure and are aligned into three (3) major complexes:

- *Naval Base Point Loma,*
- *Naval Base Coronado, and*
- *Naval Base San Diego.*

A separate NPDES Permit will be developed for each complex. Tentative Order No. R9-2002-0002 will regulate the discharges from the installations included as part of the *Naval Base Point Loma* (NBPL) Complex and is the first NPDES for the three Naval Complexes.

The Regional Board considered a tentative Order at its April 10, 2002, meeting. At the April meeting, the Navy requested an extension to allow it more time to review errata documents to the tentative Order. The errata documents proposed changes to the requirements, the industrial storm water requirements, and utility vault requirements.

The Regional Board asked that a revised tentative Order be brought back for consideration after it was rewritten to include the errata sheets. The Regional Board also directed staff to ensure that the requirements in the tentative Order provided protection of water quality equivalent to the protection provided by the General NPDES Permits for the shipyards along San Diego Bay. Additionally the Regional Board wanted the tentative Order to include an allowance for the Navy to modify its storm water pollution prevention plans (SWPPP) prior to resampling the industrial storm water discharges. The modifications made to the April tentative Order are summarized below:

- Changes provided for in the previous errata sheets from the April agenda have been incorporated in the tentative Order. This includes the toxicity specifications for the discharges of industrial storm water at SUBASE. The toxicity requirement allows the SUBASE 2 years to achieve compliance with the limit. The toxicity requirement is the same as requirements for the commercial shipyards in the San Diego Region.

- The requirements for the industrial storm water discharges were incorporated into the tentative Order. The April agenda package had the requirements as an attachment. Some modifications and edits were made to the industrial storm water requirements.
- The requirement to resample the industrial storm water discharges upon finding high levels of copper or zinc was modified. The modification allows the Navy time to adjust its best management practices (BMP) and storm water pollution prevention plan (SWPPP) prior to resampling the industrial storm water discharge. The tentative Order requires quarterly submittal of monitoring data when high concentrations of copper or zinc are found.
- The tentative Order requires the SUBASE to terminate the first 1/4-inch of industrial storm water discharges from high-risk areas no later than 2-years after the adoption of the Order. The requirement to terminate the first 1/4-inch of runoff from the high-risk areas is the same as the commercial shipyards in the San Diego Region.
- The requirements for the utility vault discharges were incorporated into the tentative Order.
- The requirement for a *systems engineer analysis report* was removed from the tentative Order.
- The discharges from *Mammal Enclosure Cleaning* and *Small Boat Rinsing* were added the tentative Order. The Navy identified the discharges after the April agenda package was developed.
- A maximum increase of 4°F temperature prohibition for the discharges from the diesel engine cooling water was included in the tentative Order.
- The fact sheet was modified to include the requirements for toxicity monitoring and the additional discharges.

Shipyard requirements

The requirements for toxicity monitoring and discharge specifications from industrial storm water discharges are similar to the commercial shipyard requirements. The tentative Order allows the Navy 2 years to comply with the toxicity requirements for the industrial storm water discharges. The requirements for termination of storm water discharges from high-risk areas are similar to the requirements for the commercial shipyards in the San Diego region. The tentative Order allows the Navy 2 years to comply with the requirement to terminate the discharges from the high-risk areas.

Workshop and 45-day Notice

On June 27, 2002, a workshop was held to discuss the revised tentative Order. The Environmental Health Coalition, the Sierra Club, the San Diego Baykeeper, and the U.S. Navy were asked to submit written comments for consideration by the Regional Board. As of July 30, 2002, staff has received comment letters from the Sierra Club, U.S. Navy, and a joint letter from San Diego BayKeeper and the Environmental Health Coalition.

During the workshop for the Naval Base Point Loma, hull coating leachate, underwater ship husbandry, and radioactive discharges were discussed.

Regulation and monitoring of hull coating leachate, and underwater ship husbandry does not need to be included in the tentative Order. Hull coating leachate, and underwater ship husbandry

will be regulated pursuant to the *Uniform National Discharge Standards for Vessels of the Armed Forces* (UNDS).

Radioactive discharges are not subject to regulation by the Regional Board. The Navy and the Department of Energy have jurisdiction for discharges of radioactive material. The Navy has a quarterly monitoring program for radioactive discharges. The USEPA has also conducted a separate, one-time monitoring program for radioactivity.

In response to the workshop discussion regarding hull coat leachate, underwater ship husbandry, and radioactive discharges, a memorandum dated 22 July 2002 was written as an attachment for the Fact Sheet for the tentative Order. The memorandum identifies the regulatory processes for discharges of hull coating leachate, underwater ship husbandry, and the monitoring processes and oversight of radioactive discharges being conducted by the Navy and USEPA. The memorandum is included with the Fact Sheet in the agenda package. The memorandum was mailed to the interested parties on 23 July 2002.

At the April 10, 2002, meeting the Regional Board asked that the revised tentative Order be available for 45-days prior to consideration by the Regional Board. By mailing the tentative Order on June 6, 2002, the interested parties should have received the tentative Order on, or about, June 10, 2002. Therefore, the interested parties should have had approximately 63 days for review of the tentative Order prior to the public hearing. The interested parties should have had approximately 47 days to review the revised tentative Order prior to the July 26, 2002, date for the submittal of written comments.

Background

The U.S. Navy installations in the San Diego area fall under the *U.S. Navy, Commander, Navy Region Southwest* (CNRSW) command structure and are aligned into three (3) major complexes:

- *Naval Base Point Loma,*
- *Naval Base Coronado, and*
- *Naval Base San Diego.*

A separate NPDES Permit will be developed for each complex. Tentative Order No. R9-2002-0002 will regulate the discharges from the installations included as part of the *Naval Base Point Loma* (NBPL) Complex. The NBPL Complex includes the Navy installations listed below.

- Naval Submarine Base, San Diego (SUBASE)
- Magnetic Silencing Facility (MSF)
- Fleet Anti-Submarine Warfare Training Center, Pacific (FASW)
- Navy Public Works Center, Taylor Street Facility (PWC TSF)
- Space and Naval Warfare Systems Center, San Diego, Point Loma Campus (SSC San Diego PLC)
- Space and Naval Warfare Systems Center, Old Town Campus (SSC San Diego OTC)
- Fleet Combat Training Center, Pacific (FCTCPAC)
- Fleet and Industrial Supply Center (FISC) Pt. Loma

Except for FASW, PWC TSF, and SSC San Diego OTC, NBPL installations are located along the eastern shore, western shore, and the interior areas of the Point Loma Peninsula at the entrance to San Diego Bay.

Point Source

The *point source* discharges as identified in the report of waste discharge (RWD) are grouped into twelve general industrial processes:

- Utility Vault & Manhole Dewatering;
- Steam Condensate;
- Diesel Engine Cooling Water;
- The floating drydock, the ARCO, Ballast Tanks;
- MSF Pier Washing;
- Dolphin Pools
- Unused San Diego Bay Water;
- Abalone Tanks & Bioassay Trailer Discharges;
- Pier Boom Cleaning;
- Mammal Enclosure Cleaning;
- Small Boat Rinsing; and
- Miscellaneous Discharges (landscape watering runoff, potable water & fire system maintenance).

An additional waste discharge included and prohibited in tentative Order No. R9-2002-0002 are discharges associated with:

- Ship repair and maintenance activities.

The additional discharge is based on the information contained in the Regional Board's administrative records.

Descriptions of the point source discharges are included in the Fact Sheet for the tentative Order. The point source discharges are intermittent or low volume with a low potential threat to water quality. The tentative Order requires monitoring to ensure that the potential threat to water quality is low.

Industrial Storm Water

Industrial storm water discharges occur at 5 of the 8 *Installations* at the NBPL. The installations are listed below.

- Naval Submarine Base, San Diego (SUBASE);
- Magnetic Silencing Facility (MSF);

- Space and Naval Warfare Systems Center, San Diego, Point Loma Campus (SSC San Diego, PLC);
- Space and Naval Warfare Systems Center, Old Town Campus (SSC San Diego, OTC); and
- Fleet and Industrial Supply Center (FISC) Pt. Loma.

A summary of the industrial activities; a brief description of the Navy's storm water working group; a discussion of the USEPA Multi-Sector permit; and a description of certain storm water monitoring analysis data are provided in the Fact Sheet.

The industrial storm water discharges from the SUBASE have significant levels of copper and zinc.

- The tentative Order requires the industrial storm water discharges from the SUBASE to comply with toxicity specifications within 2 years of the adoption of the tentative Order. The toxicity limit is a performance goal prior to the toxicity specification being required.
- The tentative Order requires additional monitoring of the industrial storm water discharges if the concentrations of copper exceed 63 µg/L or if the zinc concentrations exceed 117 µg/L. The Navy is allowed time to modify and implement changes to its Storm Water Pollution Prevention Plan (SWPPP) prior to resampling.

Radioactivity

Pursuant to the *Atomic Energy Act*, the Regional Board does not have jurisdictional authority to regulate the discharges of radioactive wastes. Therefore, this Order does not regulate discharges of radioactive wastes from nuclear submarine propulsion plants or from nuclear support facilities.

The Navy and the USEPA have conducted monitoring for radioactive discharges.

As mentioned in the previous section regarding the workshop for the tentative Order, a memorandum describing the monitoring and oversight processes for radioactivity was written for the Fact Sheet.

Comment letters

As of July 30, 2002, staff has received comment letters from the Sierra Club, U.S. Navy, and a joint letter from San Diego BayKeeper and the Environmental Health Coalition.